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3 **UNITED STATES DISTRICT COURT**
4 **NORTHERN DISTRICT OF CALIFORNIA**
5 **SAN FRANCISCO DIVISION**

6 **IN RE GOOGLE PLAY STORE**
7 **ANTITRUST LITIGATION**

8 THIS DOCUMENT RELATES TO:

9 *State of Utah et al. v. Google LLC et al.*,
10 Case No. 3:21-cv-05227-JD

11 *In re Google Play Consumer Antitrust*
12 *Litigation*, Case No. 3:20-cv-05761-JD

Case No. 3:21-md-02981-JD

DECLARATION OF
BRENDAN BENEDICT IN SUPPORT
OF PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION TO
EXCLUDE MERITS OPINIONS OF
DR. MARC RYSMAN

Judge: Hon. James Donato

1 I, BRENDAN BENEDICT, declare as follows:

2 1. I am an attorney admitted to practice in New York and Washington, DC and
3 admitted *pro hac vice* to practice before this Court in the above-captioned litigation. I am the
4 founding principal of the law firm of Benedict Law Group PLLC and am serving as a Special
5 Assistant Attorney General with the Utah Office of the Attorney General in this litigation. I have
6 personal knowledge of the matters stated herein and, if called upon, I could and would
7 competently testify thereto.

8 2. Attached hereto as **Exhibit A** is a true and correct copy of Jeffrey Church &
9 Neil Gandal, *Complementary Network Externalities and Technological Adoption*, 11 Int'l J. of
10 Indus. Org. 239 (1993).

11 3. Attached hereto as **Exhibit B** is a true and correct copy of Avinash K. Dixit &
12 Joseph E. Stiglitz, *Monopolistic Competition and Optimum Product Diversity*, 67 Am. Econ.
13 Rev. 297 (1977).

14 4. Attached hereto as **Exhibit C** is a true and correct copy of Anindya Ghose &
15 Sang Pil Han, *Estimating Demand for Mobile Applications in the New Economy*, 60 Mgmt.
16 Science 1470 (2014).

17 5. Attached hereto as **Exhibit D** is a true and correct copy of Daniel Ershov,
18 *Variety-Based Congestion in Online Markets: Evidence from Mobile Apps* (Aug. 10, 2022).

19 6. Attached hereto as **Exhibit E** is a true and correct copy of Matthew Gentzkow,
20 *Valuing New Goods in A Model with Complementarity: Online Newspapers*, 97:3 Am. Econ.
21 Rev. 713 (June 2007), which was marked as exhibit PX2754 in this litigation.

22 7. Attached hereto as **Exhibit F** is a true and correct copy of excerpts from the
23 transcript of the deposition of Dr. Matthew Gentzkow, taken in this matter on March 7-8, 2023.

24 8. Attached hereto as **Exhibit G** is a true and correct copy of Jerry A. Hausman &
25 Gregory K. Leonard, *The Competitive Effects of New Product Introduction: A Case Study*, 50 J.
26 of Indus. Econ. 237 (Sept. 2002).

27 DECLARATION OF BRENDAN BENEDICT IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION
28 TO EXCLUDE MERITS OPINIONS OF DR. RYSMAN
Case Nos. 3:21-md-02981-JD; 3:20-cv-05761-JD; 3:21-cv-05227-JD

10. Attached hereto as **Exhibit I** is a true and correct copy of excerpts from the Expert Report of Dr. Matthew Gentzkow, dated November 18, 2022, which was marked as exhibit PX2749 in this litigation.

11. Attached hereto as **Exhibit J** is a true and correct copy of excerpts from the transcript of the deposition of Dr. Marc Rysman, taken in this matter on March 10, 2023.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 18 day of May, 2023, in Washington, D.C.

Respectfully submitted,

By: /s/ Brendan Benedict
Brendan Benedict